

THE HONORABLE JAMES L. ROBERT

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA

Plaintiff,

vs.

CITY OF SEATTLE

Defendant.

CASE No. C12-1282-JLR

**MEMORANDUM SUBMITTING
THE SEATTLE POLICE
DEPARTMENT'S PROPOSED
2015 TRAINING PLAN**

Pursuant to paragraph 121 of the Settlement Agreement, the Parties and the Monitor hereby submit the Seattle Police Department's "Education and Training Section Proposed 2015 Training Plan (the "2015 Training Plan"), attached hereto as Exhibit A. Two lesson plans for elements of the Training Plan scheduled to start in February 2015 are also submitted: (1) a "2015 Officer Sustainment – Use of Force," attached hereto as Exhibit B, and (2) "Use of Force Skills One: Individual Defensive Tactics – Standing Position," attached hereto as Exhibit C.

The 2015 Training Plan reflects a significant advancement for the Department because it applies lessons learned from its Use of Force Review Board. It advances the Use of Force Review Board's risk management function by emphasizing skills and tactics that have been

1 identified as training needs to limit future risk for the Department and the public alike.¹ The
 2 Monitor is also encouraged that de-escalation tactics and force modulation themes are
 3 interwoven throughout the UOF Training.

4 The specific training on use of force that SPD officers will receive in 2015 builds upon
 5 the core training that officers received in 2014. *See* Dkt. No. 144 at 5–7. The first of this
 6 training, the Use of Force Sustainment 2015, is specifically intended to train officers to recognize
 7 and respond appropriately to various categories of potential force scenarios most commonly
 8 encountered in the field. Said otherwise, the UOF Training teaches officers tactics to assess any
 9 resistance or threat encountered, to respond with proportional force, and to deploy tactical de-
 10 escalation strategies and skills to increase officer, subject, and public safety. It is divided into
 11 class instruction on use of force concepts, followed by skill training, and dynamic drill scenarios.
 12 The dynamic drill scenarios are designed to incorporate common events that patrol officers
 13 encounter in the field. The Use of Force Skills One Training: Individual Defensive Tactics –
 14 Standing Position, provides officers with particular instruction on the safe and effective use of
 15 defensive physical tactics. Notably, all sworn members will receive use of force training during
 16 2015. Subsequent training materials for specific courses will be presented to the Court on a
 17 rolling basis throughout the year, as the context and substance is finalized.

18 Consistent with prior trainings, the Monitor and the Department of Justice have worked
 19 closely with the City and SPD since July 2014 to define and refine the 2015 Training Plan.
 20 Likewise, the Parties reviewed closely the first trainings to be held according to that plan, the
 21 Use of Force Sustainment 2015 and Use of Force Skills One courses. Following a review and
 22 revision process, which included incorporation of suggestions from the Monitoring Team, the
 23 Monitor agrees with the Parties that all training materials attached herewith satisfy the letter and
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25 ¹ For a full discussion of the Use of Force Review Board's purview, processes, and procedures, see the Monitor's Second Semiannual report at 19-22 and the Monitor's Third Semiannual Report at 48-54.

1 spirit of the relevant substantive provision of the Consent Decree. Accordingly, the Monitor
2 respectfully requests that this Court approve “The Education and Training Section Proposed
3 2015 Training Plan” (Exhibit A), the “2015 Officer Sustainment- Use of Force” lesson plan
4 (Exhibit B) and the “Use of Force Skills One: Individual Defensive Tactics – Standing Position”
5 lesson plan (Exhibit C).

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7 DATED this 2nd day of February, 2015.

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10 Merrick J. Bobb, Monitor
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1 The Court hereby approves “The Education and Training Section Proposed 2015
2 Training Plan” (Exhibit A), the “2015 Officer Sustainment – Use of Force” lesson plan (Exhibit
3 B) and the “Use of Force Skills One: Individual Defensive Tactics – Standing Position” lesson
4 plan (Exhibit C).

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6 DONE IN OPEN COURT this _____ day of _____, 2015.

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10 THE HONORABLE JAMES L. ROBART
11 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I certify that on the 2nd day of February, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record:

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DATED this 2nd day of February, 2015.

/s/ Carole Corona
Carole Corona